

IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF VIRGINIALYNCHBURG DIVISION

EMERSON CREEK POTTERY, INC.,)

Plaintiff,)

v.)

Case No.: 6:20-CV-0054-NKM

COUNTRYVIEW POTTERY CO.,)

EMERSON CREEK EVENTS, INC.,)

CHRISTINA DEMIDUK, and)

DAVID DEMIDUK)

Defendants.)

ANSWERS TO PLAINTIFF'S SECOND SET OF INTERROGATORIES

NOW COME Defendants, COUNTRYVIEW POTTERY CO., EMERSON CREEK EVENTS, INC., CHRISTINA DEMIDUK, and DAVID DEMIDUK, by and through their attorneys, Law Offices of McLaughlin & Associates, P.C., and for their Answers to Plaintiff's Second Set of Interrogatories, state as follows :

12. Identify all facts on which you base your response to any request for admission served on you in this action with any response other than solely "admit" or "admitted."

ANSWER: Defendants object to this interrogatory on the grounds that it overly broad and also seeks a narrative response which is more properly the subject of a discovery deposition.

13. Identify all facts on which you base the affirmative defenses asserted in your Answer.

ANSWER: Defendants object to this interrogatory on the grounds that it overly broad and also seeks a narrative response which is more properly the subject of a discovery deposition.

14. Identify all facts on which you base any denials in your Answer.



ANSWER: Defendants object to this interrogatory on the grounds that it overly broad and also seeks a narrative response which is more properly the subject of a discovery deposition.

15. Describe the business relationship between Christina Demiduk and Ron Wehrli regarding the gift shop, tearoom/restaurant and event businesses they operated in Oswego, Illinois.

ANSWER: Ron Wehrli originally owned the real estate on which the gift shop was operated and provided some funding for purchase of pottery to Christina Demiduk, who was his then-girlfriend. Ron Wehrli was not otherwise involved in any businesses with Christina Demiduk.

16. Identify when Defendants first offered third-party pottery for retail sale to the public at Defendants' Shop?

ANSWER: On Countryview Pottery Co. offered third party pottery for retail sale, which occurred some time between 2002 and 2004.

17. Identify all facts upon which you base your contention that Plaintiff's mark "is limited to pottery" in response to Paragraph 23 in your Answer.

ANSWER: Defendants object to this interrogatory on the grounds that it calls for a legal conclusion and attorney work product.

18. Identify each and every social media platform utilized by Defendants to market goods and services.

ANSWER: Defendants have previously answered this interrogatory in prior responses to written discovery.

19. Identify and describe each manner and use of "Emerson Creek" by defendants.

ANSWER: Defendants object to this interrogatory on the grounds that it is vague, overbroad, and is more properly the subject of a discovery deposition.

Dated: September 27, 2021

Respectfully submitted,

LAW OFFICE OF MCLAUGHLIN & ASSOCIATES, P.C.

By: 

One of Defendants' Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, I caused a copy of these Answers to Second Set of

Interrogatories to be served by hand delivery and electronic mail to:

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